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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Interior Glass Systems, Inc.,

Plaintiff,

v.

United States of America,

Defendant.

Civil No. 5:13-cv-05563-HRL

STIPULATION EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
AND CONTINUING CASE
MANAGEMENT CONFERENCE AND
~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED by and between Defendant the United States of America (“United States”) and Plaintiff Interior Glass Systems, Inc. (“Plaintiff”), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Civil Rule 6-2, that good cause exists and the parties request that the Court continue both the date for the United States to answer or otherwise respond to Plaintiff’s Complaint, and the Case Management Conference currently scheduled for March 18, 2014, by approximately 30 days, and state as follows in support:

STIPULATION EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
AND CONTINUING CASE MANAGEMENT
CONFERENCE AND ~~PROPOSED~~ ORDER
CIVIL NO. 5:13-cv-05563-HRL

Plaintiff commenced the instant action on or about December 2, 2013. Upon learning of the Complaint, the Department of Justice contacted the Internal Revenue Service's Office of Chief Counsel and requested the administrative file associated with this case. The Office of Chief Counsel has yet to provide a copy of the administrative file to the Department of Justice. Without the administrative file, counsel for the United States is unable to prepare an adequate response to the Complaint.

Accordingly, the parties hereby stipulate that the United States shall have until March 4, 2014, to answer or otherwise respond to Plaintiff's Complaint, and also that the Case Management Conference currently scheduled for March 18, 2014, be continued until April 15, 2014 at 1:30 pm. The requested extension is not being made for purposes of delay, but to allow for a review of the relevant administrative materials. No party has obtained any previous extensions in this matter.

Respectfully submitted,

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s/ Michael G. Pitman
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Systems, Inc.

1 ~~[PROPOSED]~~ ORDER

2 Upon stipulation of the parties, and for good cause shown, it is hereby ORDERED that
3 the United States of America shall have until March 4, 2014, to answer or otherwise respond to
4 Plaintiff's Complaint.

5 It is further ORDERED that the Case Management Conference currently scheduled for
6 March 18, 2014, is continued until April 15, 2014 at 1:30 pm.

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8 SO ORDERED this 12th day of February, 2014.

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11 THE HONORABLE HOWARD R. LLOYD
12 UNITED STATES MAGISTRATE JUDGE
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